

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
This document applies to:

ETHICON WAVE 9 CASES LISTED IN  
PLAINTIFFS' EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING  
DOUGLAS GRIER, M.D. FOR WAVE 9**

Plaintiffs filed a Notice of Adoption (Dkt. 8268) as to the general causation opinion testimony of Douglas Grier, M.D in the Wave 9 cases identified in Exhibit A to their Notice. In response, Defendants Johnson & Johnson and Ethicon, Inc. hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Douglas Grier, M.D. for Ethicon Wave 3 (Dkt. 2921) as their response for Wave 9. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in their Wave 3 response briefing.

Respectfully submitted,

/s/ William M. Gage  
William M. Gage (MS Bar No. 8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com)

/s/ Susan M. Robinson  
Susan M. Robinson (W. Va. Bar No. 5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338  
(304) 414-1800  
[srobinson@tcspllc.com](mailto:srobinson@tcspllc.com)

COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
William M. Gage